

**REMARKS**

Claims 1-15 are pending in this application. By this Amendment, claims 4-15 are added and claims 1-3 are amended. No new matter is added by this Amendment. Support for claims 4-15 is found at, for example, Figs. 4A-4B.

Applicants appreciate the courtesies shown to Applicants' representative by Examiner Feild and Examiner Chandran in the February 24, 2006 personal interview. Applicants' separate record of the substance of the interview is incorporated into the following remarks.

**I. The Claims Define Patentable Subject Matter**

Claims 1-3 are rejected under 35 U.S.C. §103(a) over U.S. Patent Publication No. 2001/0014029 A1 (Suzuki) in view of U.S. Patent No. 5,024,503 (Gunn). This rejection is respectfully traversed.

The Office Action acknowledges that Suzuki fails to disclose step portions on a watertight plate that has a channel sidewall. The Office Action then asserts that Gunn cures this deficiency. Applicants respectfully disagree.

Each of independent claims 1-3 recites a watertight plate including a unitary channel sidewall which is in contact with a cover plate to demarcate a channel, wherein on the unitary channel sidewall, at least three steps are formed, including a first step portion, a second step portion and a third step portion. Gunn fails to disclose or suggest such features.

The Office Action cites Fig. 2 of Gunn and asserts that Gunn discloses a first step portion (apparently something on the nut 17), a second step portion (apparently a portion of the annular shoulder 2), and a third step portion (apparently a portion of the annular recess 3). However, the "first, second and third step portions," identified in Gunn by the Office Action, are disposed on at least two different parts (i.e., the nut 17 and ceramic body 1 on which the annular shoulder 2 and annular recess 3 are formed). Hence, Gunn fails to disclose or suggest three step portions formed on the unitary channel sidewall of the watertight plate.

Moreover, neither nut 17 nor ceramic body 1 is a watertight plate. Even if the nut 17 and the ceramic body 1 could somehow be interpreted to be a single unit, the nut 17 and/or the ceramic body 1 are not a plate. The Office Action uses impermissible hindsight in asserting that Gunn suggest the numerous modifications that would need to be made to Suzuki in order to result in the combination of features recited in claims 1-3.

For at least the foregoing reasons, Suzuki and Gunn fail to disclose a watertight plate including a channel sidewall which is in contact with a cover plate to demarcate a channel, wherein, on the channel sidewall, formed are three step portions, as recited in each of claims 1-3.

Suzuki and Gunn also fail to disclose the features of claims 4-15.

For the forgoing reasons, Suzuki and Gunn, alone or in combination, fail to render obvious the subject matter of claims 1-15.

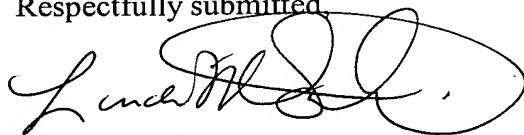
Withdrawal of the rejection is requested.

**II. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of the pending claims are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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